

# EXHIBIT 23

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**RE: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC**

1 message

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**Rick Houghton** <rhougton@mbssmartlaw.com>

Thu, Apr 17, 2025 at 9:20 AM

To: Jocelyn Stewart &lt;jocelyn@ucmj-defender.com&gt;

Cc: Jocelyn Stewart <jocelyn@ucmj-defender.com>, Talis Abolins <tabolins@mctlaw.com>, Jen Bassetti <jen@ucmj-defender.com>, "jfischer@aretelaw.com" <jfischer@aretelaw.com>, "christianm.mcguire@gmail.com" <christianm.mcguire@gmail.com>, Christian McGuire <cmcguire@mbssmartlaw.com>, Quinn Murphy <qmurphy@mbssmartlaw.com>, "kgreenberg@aretelaw.com" <kgreenberg@aretelaw.com>, Michelle Stratton <mstratton@mbssmartlaw.com>, "lfriedl@grsm.com" <lfriedl@grsm.com>, Kevin Craig <kcraig@grsm.com>, "Seaasbestos@grsm.com" <seaasbestos@grsm.com>, Joshua Severit <jseverit@mgmlaw.com>, Janice Sova <jsova@mgmlaw.com>, David Fisher <dfisher@mgmlaw.com>, Maggie Weilmuenster <mweilmuenster@mgmlaw.com>, "Daniel R. Olsen" <dolsen@mgmlaw.com>, "Olsen\_law@comcast.net" <olsen\_law@comcast.net>, Jeremy Roller <jroller@aretelaw.com>

Hi Jocelyn and Talis,

I'm writing to follow up on our ongoing discovery discussions and my correspondence dated April 11 (attached for convenience). Could you please let me know your availability to conference on outstanding discovery and other issues relating to the motion to compel arbitration? I believe we need to confer on at least the following:

- The Thesis Defendants' proposed protective order
- The validity of LeDoux's pending discovery requests
- The number and scope of permissible discovery requests
- The number, scope, and length of permissible depositions
- The Thesis Defendants' ability to rely on evidence generated in discovery in a reply brief
- The length of the Thesis Defendants' reply brief
- LeDoux's ability to file a sur-reply

I'm available to confer tomorrow afternoon and generally available on April 22 and April 23. Please let me know what works best for you.

Best regards,  
 Rick Houghton

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**From:** Rick Houghton
**Sent:** Friday, April 11, 2025 8:52 PM**To:** Jocelyn Stewart <jocelyn@ucmj-defender.com>

**Cc:** Jocelyn Stewart <jocelyn@ucmj-defender.com>; Talis Abolins <tabolins@mctlaw.com>; Jen Bassetti <jen@ucmj-defender.com>; jfischer@aretelaw.com; christianm.mcguire@gmail.com; Christian McGuire <cmcguire@mbssmartlaw.com>; Quinn Murphy <qmurphy@mbssmartlaw.com>;

Case 1:25-mc-00298-DEH Document 12-23 Filed 07/24/25 Page 3 of 4  
kgreenberg@aretelaw.com; Michelle Stratton <mstratton@mbssmartlaw.com>; Ifriedl@grsm.com; Kevin  
Craig <kcraig@grsm.com>; Seaasbestos@grsm.com; Joshua Severit <jseverit@mgmlaw.com>; Janice  
Sova <jsova@mgmlaw.com>; David Fisher <dfisher@mgmlaw.com>; Maggie Weilmuenster  
<mweilmuenster@mgmlaw.com>; Daniel R. Olsen <dolsen@mgmlaw.com>; Olsen\_law@comcast.net;  
Jeremy Roller <jroller@aretelaw.com>  
**Subject:** RE: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC

Good evening:

Please see the attached correspondence relating to the email below. Thank you, and have a good weekend.

Sincerely,  
Rick Houghton

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**From:** Jen Bassetti <jen@ucmj-defender.com>  
**Sent:** Wednesday, April 9, 2025 5:10 PM  
**To:** Jeremy Roller <jroller@aretelaw.com>; Rick Houghton <rhoughton@mbssmartlaw.com>  
**Cc:** Jocelyn Stewart <jocelyn@ucmj-defender.com>; Talis Abolins <tabolins@mctlaw.com>;  
jfischer@aretelaw.com; christianm.mcguire@gmail.com; Christian McGuire  
<cmcguire@mbssmartlaw.com>; Quinn Murphy <qmurphy@mbssmartlaw.com>;  
kgreenberg@aretelaw.com; Michelle Stratton <mstratton@mbssmartlaw.com>; Ifriedl@grsm.com; Kevin  
Craig <kcraig@grsm.com>; Seaasbestos@grsm.com; Joshua Severit <jseverit@mgmlaw.com>; Janice  
Sova <jsova@mgmlaw.com>; David Fisher <dfisher@mgmlaw.com>; Maggie Weilmuenster  
<mweilmuenster@mgmlaw.com>; Daniel R. Olsen <dolsen@mgmlaw.com>; Olsen\_law@comcast.net  
**Subject:** LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC

Mr. Roller and Mr. Houghton,

Please see the attached correspondence.

Jen L. Bassetti-Sirjesse

**Litigation Paralegal**

Law Office of Jocelyn C Stewart, Corp.  
1201 Pacific Avenue, Suite 600  
Tacoma, WA 98402

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